

Remarks:

This amendment is submitted in an earnest effort to advance this case to issue without delay.

The claims have been amended to recite a simple "partition" because the subdividing function is so obvious as to not really need a means-plus recitation.

The rejection is based on US patent 3,716,222 of Anderson.

This reference shows a furnace subdivided transversely by a succession of transverse partitions into a series of longitudinally succeeding chambers. The workpiece is passed in its entirety from chamber to chamber.

More specifically column 1, lines 59 to 65, state that a goal of Anderson is "to obtain a uniform temperature throughout" the workpiece. This is in direct contradiction to the goal of the instant invention where the goal is to prevent uniform heating and, in fact, to keep one part relatively cool so it keeps its temper. Thus in this regard Anderson teaches away from the instant invention.

The examiner cites a "top and bottom partition that extend the length of the furnace (col. 3, lines 35-52)." This is a

complete misreading of Anderson. Instead column 3, lines 55 - 58 refer to "partitions across the width of the furnace both above and below the charge throughout the width of the furnace." It is impossible to interpret this explicit disclosure as longitudinally extending partitions intended to ensure uneven heating of the workpiece.

Similarly FIG. 10 and column 8 at lines 40-60 discusses trusses 83 that extend and move longitudinally. There is nothing to suggest that these trusses 83 are crosswise partitions.

The rejection on Anderson is based on a misreading of this reference. While Anderson explicitly describes the goal as being to uniformly heat a workpiece in several stages, and lucidly describes transverse partitions, the claims of the instant application describe longitudinal partitions in a system intended to nonuniformly heat a workpiece. The best that can be said of Anderson is that it shows how unobvious the instant invention is. Any rejection on §102 or §103 on Anderson must be withdrawn.

For the reasons advanced above, all the claims in the case are clearly in condition for allowance. Notice to that effect is earnestly solicited.

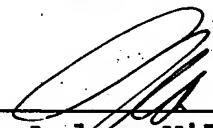
If only minor problems that could be corrected by means of a telephone conference stand in the way of allowance of this

Atty's 22718

Pat. App. 10/726,817

case, the examiner is invited to call the undersigned to make the necessary corrections.

Respectfully submitted,
Karl F. Ross P.C.


by: Andrew Wilford, 26,597
Attorney for Applicant

30 January 2007
5676 Riverdale Avenue Box 900
Bronx, NY 10471-0900
Cust. No.: 535
Tel: 718 884-6600
Fax: 718 601-1099

Enclosure: None